

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 03CV12592REK

GAETANO P. DELUCA

Plaintiff

v.

TOWN OF HINGHAM, HINGHAM
BOARD OF HEALTH, PETER B.
BICKFORD, CHAIRMAN, RAYMOND E.
BEALE, JR., RUTH ANNE BECK,
TREASURER/TAX COLLECTOR,
BRUCE T. CAPMAN, EXECUTIVE
HEALTH OFFICER and FIRST HIGH
STREET TRUST

Defendants

JOINT STATEMENT OF THE TOWN OF HINGHAM, HINGHAM BOARD OF HEALTH,
PETER B. BICKFORD, RAYMOND E. BEALE, JR., RUTH ANNE BECK, AND BRUCE
CAPMAN

I. Defendants' Discovery Plan

The Defendants propose the following pre-trial schedule:

1. Discovery dates

- (a) Automatic document disclosure to be completed on or before October 30, 2004;
- (b) Written discovery requests are to be filed by March 30, 2005, and answers/responses are to be filed within the time provided by the rules;
- (c) All depositions are to be completed by September 30, 2005, except for expert witnesses;
- (d) The plaintiff's expert witnesses shall be designated by June 1, 2005, and plaintiff's expert witness report submitted by July 1, 2005, Defendants'

expert witnesses shall be designated by August 1, 2005, and defendants' expert witness report submitted by September 1, 2005;

(c) All dispositive motions are to be filed by January 30, 2006, and responses are to be filed thirty (30) days thereafter;

(f) A final pretrial conference will be held per order of the court.

2. Proposed Schedule for filing of motions

(a) All dispositive motions are to be filed by January 30, 2006, and responses are to be filed thirty (30) days thereafter;

(b) A final pretrial conference will be held per order of the Court.

3. Certifications regarding each party's consultation with counsel regarding budgets and alternative dispute resolution be filed separately.

Respectfully submitted,
Town of Hingham et al
By its attorneys

James A. Toomey, BBO#500220
Stacey G. Bloom, BBO# 566800
Murphy, Hesse, Toomey & Lehane, LLP
300 Crown Colony Drive, 4th Floor
Quincy, MA 02169
(617) 479-5000

By the Plaintiff

Gaetano DeLuca
140 High Street
Hingham, MA 02043

CERTIFICATE OF SERVICE

I Stacey G. Bloom certify that I have served the foregoing Joint Statement on Gaetano DeLuca, pro se, 140 High Street, Hingham, MA 02043, by First Class mail, prepaid postage and Diane Hutchinson, 29 Longmeadow Road, Hingham, MA 02043, for First Street Trust, by First Class mail, prepaid postage.

DATE

9/2/04

Stacey G. Bloom

Stacey G. Bloom